

ORIGINAL

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

Amendment of Section 73.202(b))

Table of Allotments)

FM Broadcast Stations)

(Cloverdale, Alabama))

MM Docket No. 94-78

RM-8472

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

DOCKET FILE COPY ORIGINAL

COUNTERPROPOSAL

1. Leland Michael Tracy, individually, hereby files a counterproposal to the Notice of Proposed Rule Making, for the proposal to allot Channel 254A at Cloverdale, Alabama, as its first local FM service. I proposed instead to allot Channel 254A to Crump, Tennessee, as its first local service. I have supplied the required verification, and I state that if Channel 254A is allotted to Crump, I will apply as an individual or part of an entity and construct the station at Crump.

2. This counterproposal is timely filed because the due date was Saturday, September 3, 1994, and Monday, September 5, 1994, was a holiday.

3. Crump (population 2,028) is listed in the 1990 U.S. Census and located in Hardin County (population 22,633). Crump has its own local form of government which supplies municipal services, such as police and fire

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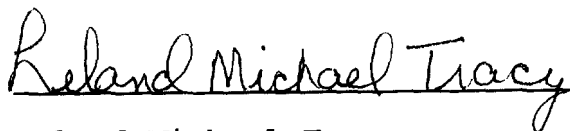
protection, a post office and zip code (38327). Therefore, Crump qualifies as a community.

4. As indicated in the attached channel study, Channel 254A can be allotted to Crump at the coordinates 35-12-00 and 88-21-00 in compliance with the Commission's spacing Rules. These coordinates are located within the city of Crump.

5. On the other hand, Cloverdale is not listed in the U.S. Census. It does not have a local government, no downtown business district and no community organizations. However, even if the Commission concludes Cloverdale qualifies as a community, Crump would be favored because it has more population.

6. Therefore, I urge the Commission to allot Channel 254A to Crump. I will apply for the channel and construct the station.

7. I hereby certify that the statements contained in this counterproposal are true, correct and complete and to the best of my knowledge and belief and are made in good faith. I did not file to delay this proceeding.



Leland Michael Tracy
3057-H Panorama East
Birmingham, Ala. 35215
(205) 854-5253

September 1, 1994

FM SPACING STUDY

Title: CRUMP, TN
Channel 254A (98.7 MHz)

Latitude: 35-12-00
Longitude: 88-21-00

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of	License	St FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
WYKL	CP	WPYR-FM, Inc.	251C1	100	35-10-28	269.2	136.2	75
Millington		TN BPH-930729ID	98.1	234	89-50-41	88.4	61.17	CLEAR
WRJB	LIC	Valley Wide Broadcasting	252A	3	36-03-25	13.1	97.68	31
Camden		TN BLH-7102	98.3	91	88-06-10	193.3	66.68	CLEAR
WZLQ	LIC	Phoenix of Tupelo, Inc.	253C1	100	34-18-09	198.1	104.8	133
Tupelo		MS BLH-4360	98.5	116	88-42-21	17.9	-28.2	SHORT

WZLQ	CP	Phoenix of Tupelo, Inc.	253C1	100	34-10-05	213.0	136.3	133
Tupelo		MS BPH-930812IB	98.5	299	89-09-23	32.5	3.255	CLOSE
PRM	ADD	Pulaski Broadcasting, In	254A		34-56-19	118.7	60.22	115
Cloverdale		AL	98.7		87-46-17	299.1	-54.8	SHORT

WHOP-FM	LIC	Hopkinsville Broadcastin	254C1	100	36-52-54	21.7	201.3	200
Hopkinsville		KY BLH-790727AG	98.7	90	87-30-44	202.2	1.287	CLOSE
KTMO	LIC	Kboa, Inc.	255C	100	36-07-53	302.4	196.3	165
Kennett		MO BLH-890504KB	98.9	303	90-11-34	121.3	31.26	CLEAR
WAHR	LIC	WAHR, Inc.	256C	100	34-47-53	105.5	162.4	95
Huntsville		AL BLH-891219KC	99.1	300	86-38-24	286.5	67.35	CLEAR
WZLT	LIC	Lexington Broadcasting S	257A	3	35-38-05	355.4	48.39	31
Lexington		TN BLH-2809	99.3	46	88-23-34	175.4	17.39	CLEAR

***** End of channel 254A study *****

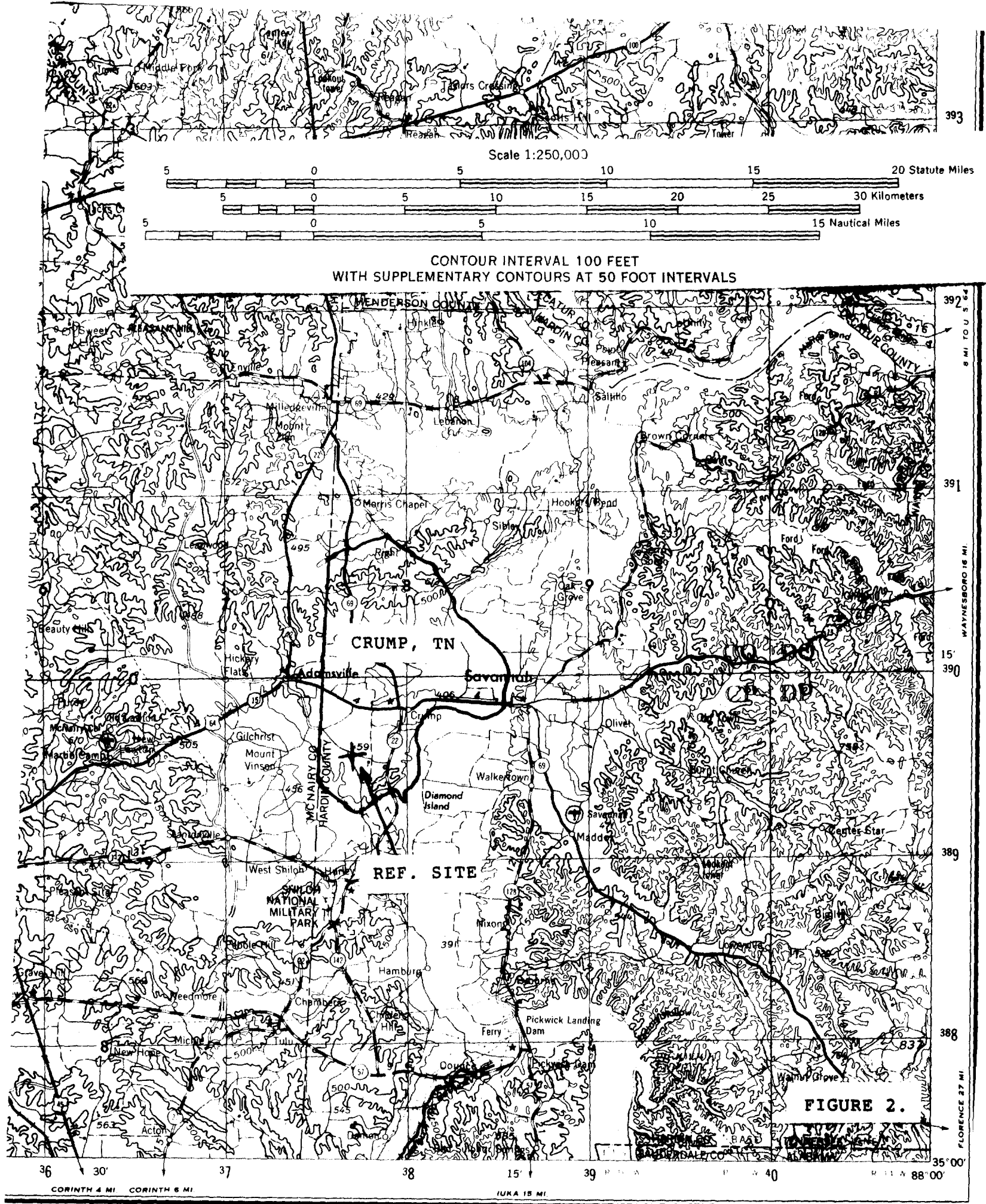
Crump, Tennessee has a population of 2,028 persons (1990 Census).

Crump is located in Hardin County 22,633 persons.

This reference point is located within the city of Crump.

WZLQ holds a C.P. which would eliminate the indicated short spacing.

FIGURE 1.



IAGRAM

84°

• INTERIOR - GEOLOGICAL SURVEY WASHINGTON, D. C. - 197

GRID ZONE DESIGNATION:
16S
100,000 M. SQUARE IDENTIFICATION

TO GIVE A STANDARD REFERENCE ON
THIS SHEET TO NEAREST 1000 METERS
SAMPLE POINT: HUNTERSVILLE

Read letters identifying 100,000 meter

CERTIFICATE OF SERVICE

I, Leland Michael Tracy, do hereby certify that on this 6th day of September, 1994, copies of the foregoing "COUNTERPROPOSAL" were sent by first class United States mail, postage prepaid, to the following:

* Nancy Joyner
Allocations Branch -- Mass Media Bureau
Federal Communications Commission
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Washington, D.C. 20554

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Commsouth Media Associates
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San Dow Broadcasting
Station WZLQ(FM)
P.O. Box 2639
Gulfport, MS 39503

Leland Michael Tracy

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* Hand Delivered